Attachment 6

Public Correspondence

Public Correspondence received as of June 28, 2007

Oregon Dept. of Fish and Game
Seaside, Convention Center
Razor Clam Digging, Commercial
Closures, South of Seaside

Bernard Bjork
Grassroots Coordinator for the
Lower Columbia Alliance for
Sustainable Fisheries
36293 Bartoldus Loop
Astoria, OR 97103

April 23, 2007

Dear Oregon Dept. of Fish and Game;

I am providing written comment from the Lower Columbia Alliance for Sustainable Fisheries, a grassroots coalition of like minded entities, that are against the closure of any traditional grounds to commercial or sports fishing, crabbing, clamming, etc. We have acquired the support of the Ports of Astoria, Ilwaco, and Chinook, WA., and the cities of Warrenton and Astoria. Also we have the support of the Oregon Anglers, a member of the Recreational Alliance, and the commercial fishing groups Western Fishboat Owners Association, Lower Columbia Crab Fishermen, and the local drag fishermans' Group, FMA.

I am writing to proclaim that we are totally against any closures of clamming to commercial clam digging, any where in Oregon. Possibly it may be worth trying a few more closures for both sports and commercial at the same time instead of picking on one group and choosing them as the culprit.

Thank you for providing me the opportunity to comment. The Oregon Dept. of fish and Game has done a very good job of protecting and enhancing our fish, clams, crab, and game. Thank you.

Sincerely;
Bernie Bjork
Bernie Bjork

Margot Visher
4/24/07

The presentation at the Razor Clam meeting in Seaside last night was excellent. After Matt Hunter's presentation & the testimony of the commercial crabbers, I feel very differently about the situation.

Thank you for

PORTLAND OR 972

25 APR 2007 PM 3 L

Margot Visher
P.O. Box 986
Cannon Beach, OR 97110

OR. Fish & Wildlife Comm.
3406 Cherry Ave. NE
Salem, OR. 97303

97303+4524

June 5, 2007

Marla Rae (Chair)
Oregon Department of Fish and Wildlife
3406 Cherry Ave. NE
Salem, OR. 97303

Madam Chairman,

I attended the April 23rd special session regarding razor clamming held in Seaside, Oregon.

I was thoroughly discouraged with the proceedings orchestrated by Matt Hunter, ostensibly the ODFW shellfish expert. After a brief treatment of razor clam life cycles and harvest data, Mr. Hunter opened up the meeting to public discussion.

Mr. Hunter's position considers the recent increase in razor clam shows south of Tillamook Head to be an anomaly, a brief "bloom" that will pass. He made his sentiments regarding harvest clear: getting them while they're available only makes good sense. According to Mr. Hunter, the clams only live for four or five years and should be harvested as aggressively as possible before this clam bloom vanishes.

When asked if curtailment of commercial activity south of Tillamook Head would alter future clam numbers, he answered "No." I feel obliged to take umbrage with that assertion. Constant digging pressure certainly translates into diminished clam numbers.

Mr. Hunter was also asked why clamming is closed during the summer months north of Tillamook Head. He said the clam zygotes needed a chance to "set" on inshore sandbars.

Those of us living south of Tillamook Head have waited 30 years for the return of razor clams in some small numbers. We would hope that ODFW policy would give this resource a chance to establish a foothold here. Commercial pillage of these creatures for crab bait seems a travesty of game management. We who live in this area are willing to make concessions for the greater public good: shortened seasons, catch limits, complete closures if warranted. If the clams on north Clatsop beaches need a chance to establish themselves during summer months, then the same should hold true for clams on our beaches as well. Historically, if clams appear on the beaches south of Tillamook Head in any numbers on a given year and the beaches are closed to the north, then diggers, both commercial and sport, concentrate on our beaches here

I would also question the validity of Mr. Hunter's harvest numbers. Until the past few months, I have never seen either Oregon State Police game officers or ODFW personnel on our stretch of beach in past years. How can an accurate profile of clam populations be generated without biologists on the beach? I have clammed in Cannon Beach for fifty

years and have never had my clam sack examined here. I have seen commercial harvest in Ecola Park and at Oswald West State Park with no enforcement constraints.
I hope something can be done to rectify this circumstance..

I enclose a letter sent previously via e-mail to your commission.

Thank you

Sincerely,

Peter M. Lindsey
Box 454 Cannon Beach, OR
97110

Previously addressed enclosure

Maria Rae (Chair)
Oregon Fish and Wildlife Commission
3406 Cherry Avenue NE
Salem, Oregon 97303

Members of the Commission:

For the past 60 years my family and I have lived in Cannon Beach and have followed closely the rise and fall of razor clam stocks along our immediate coastline.

The pressures have been intense on the resource at times. Significant numbers were harvested in select areas with some success until the late 1970's. Shellfish biologists blamed a paucity of clam numbers on sand bar instability following Mt. St. Helens' eruption in the early 1980's and other mitigating factors.

After a twenty-some year period of virtual clam absence, some numbers began appearing in the past two years. As is frequently the case, commercial harvesters quickly became apprised of the clam show and appeared in increased numbers, gleaning wheelbarrow loads of clams with every tide. With the scant clam count generally encountered south of Tillamook Head in Clatsop County, those of us who live in the community feared the commercial pressures would severely tax the resource.

With constant commercial landings tide after tide, average clam sizes inevitably dwindle. Yearling stocks comprise the lion's share of the take, and numbers decrease significantly.

We were dismayed to find that despite closures north of Tillamook Head, commercial harvest was still legal in our area. Razor clams were, ostensibly, being taken for bait sales (a proviso that bait clams be stained prior to leaving the beach got questionable enforcement). Having been a commercial harvester for a brief period in the 1970's, I suspect many of those clams either were sold for human consumption, or stocked the freezers and larders of those licensed to sell razors.

Many of us consider the taking of a unique delicacy, the razor clam, to bait commercial Dungeness Crab pots a travesty of public resource use. A utilitarian approach to the digging of razor clams would provide the most good to the greatest number. Surely the sport harvest of these bivalves serves that best.

According to information provided by your own department, clam harvesting on the Northern Oregon Coast is best on the Clatsop Beaches north of Tillamook Head. If that is, indeed, the case, then commercial harvesting should be limited to that area.

I would suggest setting aside a small portion of Clatsop Beach, say from a mile north to a mile south of the Peter Iredale for example, as a commercial harvesting site. If commercial clammers exhausted the clams in that area, then they would no longer be able to take them in other areas.

I would also propose additional delimiting of seasons for all user groups, perhaps modeled on the Washington State Fish and Wildlife plan. Short fall and spring seasons, limited and supervised areas of commercial harvest, and more stringent enforcement all would enhance the perpetuation of this unique and fragile resource, the razor clam stocks of the Oregon Coast. Future generations deserve no less.

We don't want our clams to be plundered to virtual extinction like the population of California's abalone.

Thank you very much,

Professor Peter M. Lindsey

15 June, 2007

Marla Rae, Chair
Oregon Fish and Wildlife Commission
3406 Cherry Avenue NE
Salem, OR 97303

Chair Rae and Commissioners,

Regarding commercial razor clamming south of Tillamook Head I offer the following observations.

Having closely followed this issue from the beginning, I have had the opportunity to speak with many people of varying opinions about commercial clam digging for bait south of Tillamook Head. One point on which all seem to agree is that the data we are relying on to form policy is limited, widely extrapolated, and in some cases pure speculation. Matt Hunter, your agency's local razor clam manager, seems to be in denial about the absoluteness of his data. No disrespect intended to Mr. Hunter, he has a very difficult job. His presentations, however, are preloaded with the contention that commercial harvest has no ill effects on populations. We all realize that we must use the best data available, but when that data is not fully substantiated, it should not be used as the primary contention to form policy.

Mr. Hunter stated at the Seaside public meeting that "razor clam harvest does not have an impact on razor clam population", an obvious contradiction in-and-of itself. At the same meeting Mr. Hunter answered a question about why Washington State's razor clam populations are so much more abundant than Oregon's. Mr. Hunter's response was that Washington State razor clam regulations are dictated by Native American treaties which have the effect of significantly limiting razor clam harvest. In other words, the clam populations are abundant in Washington State because harvest is limited. This contradiction seems paramount to the issue at hand.

I have personal friends at the Washington State Department of Fish and Wildlife, both in enforcement and biologist positions, who contend that Mr. Hunter's statement that razor clam harvest does not have an impact on razor clam population is quite simply incorrect, particularly in the short term. They look to the differences in the Oregon and Washington management models as evidence of this. They agree that there are many factors affecting clam populations, but to contend that removing 100,000 clams will have no more impact than removing 1,000 clams is ludicrous.

That said, why would we choose a policy that placates a handful of people who supplement their income by taking unlimited numbers of clams from beaches that only periodically have harvestable numbers over a policy that gives hundreds of license paying recreational users the opportunity to harvest limited amounts of this delicacy for personal use?

I urge you to ban the commercial harvest of razor clams south of Tillamook Head in Clatsop County.

Thank you for your consideration and time.

Ron Logan
PO Box 153
Cannon Beach, OR 97110

Greensheet: Fish
Razor Clams

Jason A. Seivers
PO Box 1218
Cannon Beach, OR 97110

March 11, 2007

Attn: Marla Rae (Chair)
Oregon Fish and Wildlife Commission
3406 Cherry Avenue NE
Salem, Oregon 97303

Dear Commissioners,

I am writing to you to thank you for your recent decision to review clamming regulations on the Oregon coast, and to encourage you to please disallow commercial harvest of clams south of Tillamook Head. I realize you have to satisfy the interest of diverse constituents, and I commend you for taking on the task of resolving so much conflict over bi-valves. I am confident you will make the right decision, and this letter is in no way meant to demean commercial clammers, nor demonize the commission or staff who established the current regulations. That being said, I want to make sure one more voice is added to the clam chorus in favor of changing the current policy.

I have lived in Cannon Beach since 2004. My house is just two blocks from Chapman Point, and I walk my dog two or three times a day there every day. I know that many of my neighbors have written to you recently regarding this clamming issue with tales of how they remember when, years ago, razor clams were readily harvested from the sands of Cannon Beach, and how they are only now just returning. I was still a high school kid in Portland 20 years ago, so I don't have any recollection of those clamming glory days, but imagine my delight when, several months ago, I happened upon various neighbors sauntering home from the beach in their knee-high rubber boots with small sacks of clams proudly slung over their backs. I asked one what they were carrying and was delighted to hear about how "this is the first time we've been able to clam here in 20 years!"

To be honest, not being a big clam guy (though I do admit a fondness for clam chowder), I didn't run to the market for a clam gun or shovel – I was content to know they were back, that perhaps the ecosystem in my backyard was better off now that one of its key species had returned, and perhaps one of my neighbors might invite me over for a nice clam bisque some time soon! Imagine my surprise though, when later that week I happened upon numerous men on the beach at low tide filling huge wheel barrows full of razor clams! I was especially surprised to see them north of Chapman Point clamming on Crescent Beach, which is clearly within the boundaries of Ecola State Park, and on many occasions long into the night. How could it be that the general public was limited to 15 clams for recreational purposes, but these commercial clammers could harvest without limit and were in fact taking a number of clams equivalent to entire neighborhoods of recreational clammers?

Perhaps some ecological reasoning can be made to justify this policy, but I trust you would agree that even if such an argument could be made, on the face of it this current harvest policy appears to be quite unfair – it just doesn't make sense. Furthermore, knowing that these clams – a high-end delicacy in most places - would likely be used for crab bait makes such a policy seem all the more nonsensical and inappropriate, especially when other bait alternatives are readily available.

Forgive me if these closing lines seem like too much hyperbole – they are not meant to be, but rather are meant as a sincere reflection. I am a sixth-generation Oregonian and my Finnish-born, great-great-great-grandparents came to the lower Columbia region in the 1870's. My g-g-g-grandfather, John Luis, caught salmon on the Columbia River during a time when the runs seemed limitless, and indeed, there was no limit on the take. I don't begrudge my ancestor for making a living by what, at the time, must have seemed like reasonable standards. However, I wish dearly that he and his fellow fishers had held the foresight to consider that some time, five generations later, their descendants would long to see those same massive runs splashing up the river, and those same descendants would feel a great loss in the absence of those historic runs. Clams may not be as charismatic as salmon, but I hope you will look to the future and make a decision that guarantees our descendants, five generations from now, the opportunity to enjoy a rich abundance of razor clams on our beach the same as I have been able to do this past year.

Sincerely,

Jason A. Seivers

DEAR MARLA RAE:

AS A FULLTIME RESIDENT OF CANNON BEACH I WAS VERY EXCITED, WHEN THE RAZOR CLAMS, AFTER MANY YEARS, SHOWED UP AGAIN ON OUR LOCAL BEACH.

WHAT A GREAT THING TO BE ABLE TO DIG OUR LIMIT OF 15 AT CANNON BEACH.

WHEN THE BEACHS WERE CLOSED NORTH OF TILLAMOOK HEAD BUT LEFT OPEN TO THE SOUTH, WE HAD COMMERCIAL CLAMMERS COME TO CANNON BEACH AND BEGAN TO TAKE ENORMOUS AMOUNTS OF CLAMS.

WHEN I FOUND OUT THAT MOST OF THE COMMERCIAL DIG WAS FOR CRAB BAIT I COULDN'T BELEIVE IT.

I GO CRABING QUITE OFTEN, I OR ANYONE I KNOW WOULD NEVER THINK OF USING CLAMS FOR CRAB BAIT, THEY ARE TO VALUABLE FOR HUMAN CONSUMPTION.

IF THE COMMERCIAL DIGS FOR CRAB BAIT, ARE ALLOWED TO CONTINUE, I BELEIVE THE CLAMS WILL DISAPPEAR FROM THE LOCAL BEACH AGAIN.

YOUR HELP IN THIS MATTER WOULD BE GREATLY APPRECIATED.

YOURS TRULY
TOM SOPHY
P.O. BOX 139
CANNON BEACH 97110

503-436-2890

~~Greensheet: Fish~~

moda
r e a l t y

2430 sw vista ave
portland, or 97201
tel. 503.245.3357
fax. 503.293.7286
email. herb@modarealty.com
web. www.modarealty.com

Marla Rae (Chair)
Oregon Fish and Wildlife Commission
3406 Cherry Avenue NE
Salem, Oregon 97303

Dear Ms. Rae,

My family hails from the Grays Harbor area of Washington State. My aunt, and later myself, moved to Portland to raise our families, but continue to enjoy the wonders that The Great Northwest has to offer. Over the years we have witnessed the depletion of many of our natural resources and wildlife for a variety of reasons. We are now witnessing another potential loss. The treasured razor clam, typically cherished by diners as a delicacy, is being caught and used by commercial clammers for crab bait. How absurd is that? This use of this scarce bi-valve boggles the mind. First, there are many less expensive alternatives to the razor clam for bait that are not in danger of being completely depleted. Secondly, the return of the razor clam to Cannon Beach should be seen as a triumph in an effort to save a species from extinction rather than an opportunity for a small handful of opportunists to make a fast buck and drive another nail into the coffin of our natural resources. I suggest a heavy restriction on the use of razor clams for bait, continue to limit recreational clammers and give the razor clam an opportunity to re-populate and return in abundance to grace the list of indigenous species that make our part of the country "The Great Northwest".

Sincerely,

Herb Kirshrot
4941 SW 39th Drive
Portland, Oregon 97221
herb@modarealty.com

Diane Amos P O Box 494 Cannon Beach, OR 97110
503.436.0936 direx@charter.net

February 20, 2007

Attn: Marla Rae (Chair)
Oregon Fish and Wildlife Commission
3406 Cherry Avenue NE
Salem, Oregon 97303

Dear Commissioners:

As you may remember, I testified before the Oregon Department of Fish and Wildlife Commission in Seaside on February 9. I expressed my chagrin at having discovered commercial clam harvesters plying their trade on the beach south of Chapman Point in Cannon Beach just after the Clatsop Beaches were closed to clam harvesting in June 2006. I also testified as to the shock and dismay of everyone I've talked to when they learned for the first time, as I did, that all clams harvested commercially in Oregon south of Tillamook Head can only be sold for crab bait.

As a recreational clam harvester, I was relieved when shellfish licenses finally became required. I had always wondered why they were never required before. I, and others for whom I speak, would be completely in favor of an increase in the cost of the shellfish license in order to provide the state with enough revenue to monitor both commercial and recreational clam harvesting to see that all regulations are being followed. I would not be too disappointed to see limits for sports clamming lowered from the present 15 per person to 12 or 10 if it means conservation of the resource. In my lifetime I have already seen the limits lowered from 24 to 15.

Along with this, a limit should be put on commercial clam harvesting for human consumption and a prohibition of all commercial clam harvesting for crab bait. Since the clam population is a public resource, it should provide the greatest good for the greatest number of people. For a few commercial harvesters to take unlimited numbers of clams to sell to the crabbing industry is not the best use of a resource that belongs to the public, especially when clams, as is commonly known, are not the only bait that can be used for crabs. They may be the best bait, but they are not the only bait. Old growth timber makes the best veneer, but we now realize that it would be folly to continue using it for that purpose.

I am grateful that the Commission has agreed to examine the present laws governing the harvest of razor clams in Oregon and wish to encourage the conservation of the razor clam population for future generations.

Sincerely,
Diane Amos
Diane Amos

From: daryl johnson <wavecrest.cb@charter.net>
Subject: **Razor Clam Policy**
Date: February 16, 2007 1:17:56 PM PST
To: Maria Rae, Chairwoman

Oregon Fish and Wildlife Commission
3406 Cherry Ave. NE
Salem, Oregon 97303

Dear Commissioners,

The current policy in Oregon governing unlimited commercial harvesting of razor clams and their use as bait in dungeness crab pots is deplorable, antiquated, and unfair. It makes no sense to use these expensive and delicious clams for bait when there are many other low cost alternatives that yield just as many crabs.

Unlimited harvesting of razor clams is so outdated in terms of sustainability, that one wonders why we have the Endangered Species Act and if anyone has examined marine science data in the past decade.

As a recreational razor clam digger who's limited to 15 clams a day, it's oppressive to see commercial clammers haul off hundreds of clams a day just to be dumped into crab pots.

As the owner of an historic hotel (Wave Crest Inn) in south Cannon Beach, I have been grateful and have found it rewarding to see razor clams back on the beaches between Tolovana Park and Arcadia State Park. It has been nearly 30 years since they were last seen on this stretch of the beach. My guests, who contribute to the local economy in numerous ways, unlike commercial clammers, are quite delighted to have the opportunity to dig razor clams just a few hundred yards from my inn.

The City of Cannon Beach, by recently passing a resolution banning commercial harvesting of razor clams for crab bait has taken a first step in conserving this valuable asset. My preference would be to ban all commercial clamming from Chapman Point to Arcadia State Part. A change in our current antiquated policies is sorely needed and a vision to enhance a sustainable harvest of razor clams on our beaches is long overdue.

We can live with what mother nature gives us and what she takes away, but we should not hasten the demise of razor clams by over harvesting.

Respectfully,
Daryl Hank Johnson

Greensheet

February 17, 2007

Marla Rae, Chair
Oregon Fish and Wildlife Commission
3406 Cherry Avenue NE
Salem, OR 97303

Re: Razor clams being commercially harvested exclusively for crab bait south of Tillamook Head—with no limit

Dear Ms. Rae:

We have been very unpleasantly surprised to learn that razor clams are being commercially harvested exclusively for crab bait south of Tillamook Head, with no limit on the number that can be taken.

For years, we have savored razor clams whenever we've been treated by our friends on the coast. who dig them when they can, following the set limits. We consider razor clams one of the wonders of our Oregon bounty. We would be happy to have commercial clammers also harvest this delicacy—as long as they have limits, too, and as long as the priority is the public consumer, not bait. There needs to be limits that make sense. Taking unlimited clams—and solely for crab bait—seems very wrong. Surely crabs can be caught by any number of other types of bait.

We understand that the Oregon Fish and Wildlife Commission is reviewing the situation. We would very much appreciate your considering a change in razor clam policy and commercial limits. Thank you.

Sincerely,

Rick & Charlotte Rubin

Rick and Charlotte Rubin
2147 NW Irving St.
Portland, OR 97210

Street Address:
3632 S. Pacific Dr.
Tolovana Park, OR 97145

JOHN HARRINGTON
P.O. BOX 910
CANNON BEACH, OR. 97110

(503) 436-2903
E-MAIL: HARCO@SEASURF.NET

February 16, 2007

Attn: Maria Rae (Chair)
Oregon Fish and Wildlife Commission
3406 Cherry Ave. NE
Salem, OR 97303

Re: Harvesting Razor Clams in Cannon Beach area

Dear Ms. Rae:

This is regarding the commercial harvesting of unlimited quantities of razor clams south of Tillamook Head in Clatsop County for use as crab bait.

The Cannon Beach area has been almost barren of any razor clams for the past 30 years. Now that they are beginning to come back the commercial harvesters are decimating the razor clam population in this area once again. It will take another 20 to 30 years to populate our beaches with this species if we can't stop this practice now.

I am very much opposed to any type of commercial harvesting south of Tillamook Head. It is very disturbing to see these diggers dragging their huge bags and cleaning out this recently populated area.

Please consider revising the Oregon Administrative Rules regarding the harvesting of razor clams.

Sincerely,

John Harrington

John Harrington

RECEIVED
FEB 28 2007
O.D.F.W. MAIL DEPT.

To: Oregon Fish and Wildlife Commission
3406 Cherry Avenue NE
Salem, Oregon 97303
From: Norma Edythe Heyser
Re: Commercial Harvesting of Razor Clams

I understand the Oregon Fish and Wildlife Commission is in the process of revisiting the Oregon Administrative Rules governing the harvesting of razor clams on the Oregon coast and appreciate the work of Rex and Diane Amos in bringing this issue to the attention of citizens so that we are able to respond.

I strongly oppose the commercial harvesting of unlimited quantities of razor clams for use as crab bait only. The practice not only depleats our clam population, it affects the ecological balance and health of our Oregon coast.

As citizens worldwide begin to focus on dramatic Global Change I ask that you help the State of Oregon take responsible action to require sustainable clam maintenance, harvesting and the conservation of Oregon coast clams.

Thank you,

Norma Edythe Heyser
840 F Ave
Lake Oswego Or
97034

ODFW
FEB 28 2007
Director's Office

February 17, 2007

Oregon Fish and Wildlife Commission
Attn: Marla Rae

Re: Commercial harvesting of razor clams

Dear Marla:

I am writing you in response to the recent correspondence regarding the unlimited harvesting of razor clams by the commercial crabbing industry. Two main issues on this subject just don't make sense:

1. Using one "sought after" product of the ocean to harvest another.
2. Allowing unlimited harvesting of the razor clams by the commercial industry while an individual is limited to 15.

My family and I have enjoyed both crabbing and clamming on the Oregon coast for years. Old fish heads and carcasses have always attracted crabs into our pots in the past. When I asked many of my friends who also enjoy the coast, 100% of them could not believe the crabbers were using razor clams for bait. In restaurants, you can tell by the "specials" that razor clams are more sought after then the always offered "Crab Louise or crab sandwiches". In addition, clamming is a family activity that any family can do. You don't need a boat, poles, etc. With a license and shovel, the hours getting wet and "chasing" the clams is family time well spent.

Having others on the beach taking unlimited amounts of razor clams in large "bins" with large nets while we sometimes struggle to get our limit sends a wrong message to my 3 daughters on how well the government is taking care of our natural resources and being fair to the everyday public.

Please review your current rules regarding the commercial harvesting of razors clams. The current commercial harvesting abilities just don't make sense.

Thank you for you continued efforts to keep the Oregon Coast one of the greatest places on earth.

Sincerely,

Bill Ellis, P.E.

Tammy Ellis
T. Ellis

Stacey Ellis
Stacey Ellis
(16 yrs old)

Meghan Ellis
Meghan Ellis (13)

Madelynn Ellis
Madelynn Ellis
(11)

February 20, 2007

John C. Amos
4925 S. E. Fieldcrest
Milwaukie, Or. 97222

Oregon Fish & Wildlife Commission
3406 Cherry Ave. N. E.
Salem, Or. 97303

Attention: Marla Rae, Chair

Dear Commissioners,

My brother Rex and sister-in-law Diane, recently attended your meeting in Seaside where they gave testimony opposing the use of clams as bait for crab by commercial interests. As one of those people who enjoys eating local razor clams, I am writing to support their position.

It is my understanding that this is the first year that clams have been found in abundance in the Cannon Beach area after an absence of many years. Therefore it would make sense to eliminate the commercial catch for crab bait in hopes of sustaining clams for the future in this area and areas further to the South. Restricting commercial catch of clams to North of Tillamook Head could go a long way toward maintaining clams for recreational diggers in the Cannon Beach area and further South. Since clams were abundant in these areas many years ago, it only makes sense to see if these beaches could re-seed with razor clams again..

Sincerely,

John C. Amos

Maria Rae (Chair)
Oregon Fish and Wildlife Commission
3406 Cherry Avenue NE
Salem, Oregon 97303

Members of the Commission:

For the past 60 years my family and I have lived in Cannon Beach and have followed closely the rise and fall of razor clam stocks along our immediate coastline.

The pressures have been intense on the resource at times. Significant numbers were harvested in select areas with some success until the late 1970's. Shellfish biologists blamed a paucity of clam numbers on sand bar instability following Mt. St. Helens' eruption in the early 1980's and other mitigating factors.

After a twenty-some year period of virtual clam absence, some numbers began appearing in the past two years. As is frequently the case, commercial harvesters quickly became apprised of the clam show and appeared in increased numbers, gleaning wheelbarrow loads of clams with every tide. With the scant clam count generally encountered south of Tillamook Head in Clatsop County, those of us who live in the community feared the commercial pressures would severely tax the resource.

With constant commercial landings tide after tide, average clam sizes inevitably dwindle. Yearling stocks comprise the lion's share of the take, and numbers decrease significantly.

We were dismayed to find that despite closures north of Tillamook Head, commercial harvest was still legal in our area. Razor clams were, ostensibly, being taken for bait sales (a proviso that bait clams be stained prior to leaving the beach got questionable enforcement). Having been a commercial harvester for a brief period in the 1970's, I suspect many of those clams either were sold for human consumption, or stocked the freezers and larders of those licensed to sell razors.

Many of us consider the taking of a unique delicacy, the razor clam, to bait commercial Dungeness Crab pots a travesty of public resource use. A utilitarian approach to the digging of razor clams would provide the most good to the greatest number. Surely the sport harvest of these bivalves serves that best.

According to information provided by your own department, clam harvesting on the Northern Oregon Coast is best on the Clatsop Beaches north of Tillamook Head. If that is, indeed, the case, then commercial harvesting should be limited to that area.

I would suggest setting aside a small portion of Clatsop Beach, say from a mile north to a mile south of the Peter Iredale for example, as a commercial harvesting site. If commercial clammers exhausted the clams in that area, then they would no longer be able to take them in other areas.

I would also propose additional delimiting of seasons for all user groups, perhaps modeled on the Washington State Fish and Wildlife plan. Short fall and spring seasons, limited and supervised areas of commercial harvest, and more stringent enforcement all would enhance the perpetuation of this unique and fragile resource, the razor clam stocks of the Oregon Coast. Future generations deserve no less.

We don't want our clams to be plundered to virtual extinction like the population of California's abalone.

Thank you very much

Professor Peter M. Lindsey

DEBORAH BOONE
State Representative
DISTRICT 32

HOUSE OF REPRESENTATIVES

1 March 2007

Oregon Fish & Wildlife Commission
c/o ODFW
3406 Cherry Avenue NE
Salem, OR 97303

Dear Commissioners:

I am writing to offer comments on the issue of using razor clams as bait for commercial crab fishing.

As you know, razor clams are considered a delicacy, especially to those of us who reside along the beautiful Oregon coast and can enjoy them fresh often.

I was introduced to digging last May on Mother's Day when my son took me to the sands in lieu of our usual annual trek along the Salmonberry River to watch the wild steelhead jump the falls.

Clam digging (and eating!) has now become an obsession with me and I don't think I missed a tide until the legislative session began in January of this year.

Late last year, the citizens of Cannon Beach were given a gift from God when after 30 years of absence razor clams returned to the north beach sands south of Tillamook Head. The locals went crazy. Then they saw people coming to their beach to harvest these delicious creatures to be used as bait. They went crazy again.

Without belaboring the facts, I want to go on record as opposing this 'bait use' harvest in the area south of Tillamook Head in order to avoid losing the clams again and having to wait another 30 years for them to return to our sands. Thank you.

Sincerely,

Deborah Boone

Deborah Boone

Office: 900 Court St NE , Salem, OR 97301 — Phone: 503-986-1432 — rep.deborahboone@state.or.us
District: P.O. box 637, Cannon Beach, OR 97110 — Phone: 503-717-9182 — Fax: 503-717-8518

Maria Rae, chair
Oregon Fish and Wildlife Commission
3406 Cherry Avenue NE
Salem, OR 97303

Members of the Commission:

Like many others who live in Cannon Beach, I was dismayed to learn that commercial diggers were extracting unlimited numbers of razor clams south of Tillamook Head. Furthermore, my dismay bordered on outrage upon learning that these clams may be sold as bait. As a native of Clatsop County and having dug clams on the northern Oregon coast beaches since I was a child; and, having had ties to the Cannon beach area since the mid-1970's; and, having owned a home here since 1982, I am well-aware that the availability of razor clams in the Cannon Beach area is infrequent at best. Up until two years ago, there have been virtually no razor clam shows since the late 70's or early 80's. Therefore, I not only question the current regulation managing this resource, but urge the commission to ban commercial razor clam harvest from this area.

Somehow there is in my mind some inconsistency in policy which restricts licensed recreational diggers to the first 15 razor clams regardless of condition or size, but allows commercial diggers to harvest unlimited numbers to sell however they choose. While I have no argument that commercial harvesters can and do provide this delicacy to markets for human consumption as certainly not everyone who enjoys eating razor clams wishes to dig for them, the harvesting for bait is another matter. Allowing the sale of one sensitive resource–razor clams–to bait for another resource–Dungeness crab–both of which retail for nearly the same price, has to be questionable policy. The general public has been led to believe that with licensing for recreational digging as well as a reduction in the daily limit from 24 to 15, there must be issues with diminution of razor clams. But if this resource is allowed to be sold as bait, the inference is that there must be an oversupply for food consumption in the retail market. I am quite certain that there is no oversupply in the Cannon Beach area or areas south of Tillamook Head.

According to the Oregon Fish and Wildlife website, almost all the razor clams are north of Tillamook Head. Therefore, it seems reasonable policy to restrict commercial diggers to this area. For those of us for whom the reappearance of razor clams in our Cannon Beach area was cause for excitement after so many years of dearth, it was and is disheartening learning that these same precious clams were being harvested in unlimited numbers. To learn that they were being sold as bait, really stirred the pot. I urge the commission to ban commercial harvest of razor clams in the Cannon Beach area.

Sincerely,

Karen J. Hoyt
PO Box 969
Cannon Beach, OR 97110

Dear Marla – March 3, 2007

Greetings from the McKenzie where it momentarily appears we are on the back edge of winter. Blue sky, white clouds and brilliant sunshine.

I'm writing to add my voice to "The Issue That Won't Go Away" – the sanctioned practice of digging limitless numbers of razor clams for commercial purposes.

You've been properly exposed to friends of mine, Diane and Rex Amos. The two most able, energetic and creative citizen activists I've known. They came to this issue for all of the right reasons: they care about the Cannon Beach area they enjoy every day and it's flora and fauna. You heard the testimony and are receiving supporting letters similar to this.

As I've said to them on more than one occasion, I was confident with you as Chair, they would receive a fair hearing, and the issue would be properly aired. I believe that is occurring.

And, for the record, I'm hoping the Commission will find that Oregon's razor clam population deserves a revised stewardship. One that places the gathering and eating of this delicacy by citizens over the practice of allowing a few people to harvest without limits using them for crab bait.

Looking forward to appearing before you on this issue.

Best regards –

Bob Pickard

P. O. Box 158
Oysterville, WA
98641
19 February, 2007

Marla Rae, Chair
Oregon Fish and Wildlife Commission
3406 Cherry Avenue NE
Salem, Oregon 97303

Dear Ms. Rae:

Though no longer an Oregonian, I'm writing you as someone with strong ties to his native state who is very concerned about the situation on the coast in which commercial crab harvesters are able to dig unlimited numbers of razor clams for use as crab-bait. The Cannon Beach area is a mecca for tourists, and razor clams are an expensive and much sought-after delicacy whose harvest needs to be carefully thought out with a view to long-term sustainability. I know several Cannon Beach residents who are extremely upset with the current regulations which permit a considerable harvest of razor clams for crab bait. I wish to add my voice to theirs. The argument that Dungeness crab need to be harvested with razor clam bait, either solely or principally, needs to be seriously re-evaluated.

I urge you to put severe limits on commercial clamming for crab bait, explore more sensible bait sources, and protect the rights of local residents and tourists to harvest razor clams for years and generations to come.

With many thanks for all you do to husband the state's resources,

Sincerely yours,

Peter Janke

February 18, 2007

Dear Marla Rae:

I can't "Dig It."

That is commercial digging of razor clams in unlimited amounts for the purpose of crab bait.

Clams are a delicacy! Selling nearly for the price of crab.

There are many other options other than the delicacy of razor clams for bait. Any recreational crabbing I have done was using a fish carcass for bait. I did well.

Living in Cannon Beach there has been no show of clams for the past 25 - 30 years. Now that we have them showing we also have commercial diggers taking unlimited amounts.

I witnessed a commercial digger with four five gallon buckets filled to the top coming off the beach. This for crab bait! Not fair or right. One theory presented by a commercial digger is to dig them out before ocean conditions change and/or the clams mature and die. Can you believe? Let's give the clams that chance especially to an area that has been absent of clams for so many years.

Ask most anyone this one question. Did you know most commercial diggers are harvesting clams in unlimited amounts for the purpose of crab bait? Watch the reaction.

The public needs to know loud and clear most commercial diggers are digging clams for bait and not for human consumption. I have yet to tell anyone of this issue that they are not in total disbelief.

I would like all commercial harvesting of clams to be kept on Clatsop Beaches North of Tillamook Head. Beaches South of Tillamook Head to the border be open for recreational digging only.

To be real honest I would rather see no commercial clam digging for the purpose of bait.

Thank you, Dale Hintz, Linda Hintz

Dale and Linda Hintz
P.O. Box 712
Cannon Beach, Oregon 97110
503-436-1046
beachbums@theoregonshore.com

JOHN HAMIL
JH
12820 S.E. COOPER ST
PORTLAND, OR 97236
503-760-6718

February 19, 2007

Attn: Marla Rae (Chair)
Oregon Fish and Wildlife Commission
3406 Cherry Avenue NE
Salem, Oregon 97303

Please consider imposing some control over the commercial razor clam harvesting on Oregon beaches. Our resources are not unlimited. To allow unlimited commercial clamming for use as crab bait is not in the public interest.

John Hamil

16 February, 2007

Oregon Fish and Wildlife Commission
Attn: Maria Rae (Chair)
3406 Cherry Avenue NE
Salem, OR 97303

Dear Madam Chair,

As your commission considers the regulations governing razor clam harvesting on Oregon's beaches, I would like to submit several points which I consider important to the issue.

I would like to preface my comments by saying that I, my family, and many friends have been harvesting razor clams for sport in Oregon, Washington, British Columbia and Alaska for many years. Throughout the years, all of us have been puzzled at Oregon's seemingly antiquated and limited regulations with regard to razor clam harvesting, particularly when compared with those of other states and Canada. The exceedingly long season, the unlimited number of commercial licenses, the lack of enforcement presence, and, until recent years, the absence of user fee licenses have all contributed to our disappointment.

Frankly, razor clam digging in Oregon is poor in comparison to all other jurisdictions north. Thousands of sport diggers choose Washington's Long Beach over Oregon's Clatsop Beach because the clamming is markedly and consistently better. Hundreds of thousands of tourist dollars are lost annually with this exodus. Please look carefully at Washington's model for razor clam management. It affords a consistent and favorable experience for the sport clamer by limiting seasons, providing adequate enforcement, prohibiting commercial harvest, and maintaining permanently closed test areas.

Recently, and for the first time in over 20 years, razor clams began showing up on the beaches south of Clatsop Beach between Tillamook Head and Neakanie Mountain. Sport diggers in Cannon Beach were dismayed at the sight of commercial diggers taking hundreds of clams a day persuent to a regulation which apparently allows commercial mining of clams for use as crab bait. Soon, the sport clammer could no longer find razor clams on these beaches and a great opportunity to expand Oregon's sport clamming range seems now lost. This example illustrates how inappropriate Oregon's commercial razor clam regulations are at present. To allow commercial harvest at all is suspect, but to allow it for the purpose of providing crab bait is ludicrous. One Oregon delicacy

being mined as bait for another Oregon delicacy is something that none of us can understand.

Any modification to Oregon's razor clam regulations should include limiting seasons (use Washington model), prohibition of commercial harvest, increased enforcement, and permanently closed areas. Our razor clam regulations are severely outdated and need your attention. I hope you will consider these thoughts and thank you for your efforts, time, and consideration.

Best Regards.

Ron Logan
PO Box 153
Cannon Beach, OR 97110